

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
FIVE POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912**

MEMORANDUM

DATE: December 8, 2015

SUBJ: TSCA Lead Inspections (Sections 1018 and 402(c)/ RRP Records) of *Welsh Realty dba Beebe Valley Family Partnership et al., Campton, NH*

FROM: M. Molly Magoon, Environmental Protection Specialist
Office of Environmental Stewardship (OES), Toxics and Pesticides Unit (TPU)

THRU: James Chow, Acting Manager, OES, TPU

TO: File

I. Business Information

- A. Business Name: Welsh Realty dba Beebe Valley Family Partnership, Campton, NH and as other entities that own target housing
- B. Principal Member and Property Manager: Robert “Bob” Welsh, father and Robert “Rob” Welsh, son
- C. Inspection Location:
- Target Housing Property:
37 Back Street, Campton, NH
 - Business Address:
120 Center Hill Road, Landaff, NH 03585
Phone: Rob Welsh (son) (802) 779- 5608

II. Background Information

- A. Date of Inspection: July 17, 2015

B. Personnel Present during Inspection:

Molly Magoon – US EPA

Charles Brousseau – Town of Campton, NH Health Dept.

Robert “Bob” Welsh (father) and Robert “Rob” Welsh (Son) – Welsh Realty dba Beebe Valley Family Ltd. Partnership

III. Purpose of the Inspection

This EPA inspection was conducted to document and verify compliance with Section 1018, the Real Estate Notification and Disclosure Rule (“Disclosure Rule”) codified at 40 C.F.R. 745, Subpart F and with the requirements of Section 402(c), the Renovation of Target Housing Rule, codified at 40 C.F.R. 745, Subpart E (“Renovation, Repair and Painting Rule” or “RRP”). It is as a result of a complaint that was brought to EPA Region 1’s Lead Enforcement program on July 16, 2015 by Knatalie Vetter of NH Department of Health and Human Services (NH DHHS) and then communications directly with the mother of a lead poisoned child (“Complainant”). The complainant explained to Inspector Magoon that the most critical issue involves her family living in a rented single family home, located at 37 Back Street, Campton, NH that was, at the time of the complaint, being renovated. One of her children, who is under six years old, has been identified as having an Elevated Blood Lead Level (EBLL). The property was built in the 1920s. The property is owned, managed and maintained by Welsh Realty dba Beebe Valley Family Ltd. Partnership.

IV. Summary of EPA Inspection Activities

Prior to the on-site inspection, Inspector Magoon responded to a tip referred from the NH DHHS office from a mother of a child with an EBLL, Jennifer Acosta. According to Ms. Acosta, she and her family rented and occupied a single family house, located at 37 Back Street, in Campton, NH since February 2011. Inspector Magoon also contacted Mr. Brousseau, a Code Enforcement Officer for the Town of Campton Health Department. She and Mr. Brousseau agreed to meet before going to the house at 37 Back Street. Once they met, they then drove in caravan-style to the Acosta residence at 37 Back Street. They both met and talked with Jennifer Acosta, the complainant briefly. She informed the inspectors that the maintenance worker was not at her house at the time, but she knew he was working on another property around the corner. So, the inspectors proceeded to walk to another singled family, target housing property around the corner- another property that is also owned, managed and maintained by the Welshes. Once there, Inspectors Magoon and Brousseau met Johnny Lopez, who identified himself as being an employee of the Welsh’s company. Inspector Magoon showed Mr. Lopez her credentials and asked if they could step outside to discuss the ongoing work at the 37 Back Street house. He was preparing to start painting the interior walls in the vacant house. Once outside, the inspectors again introduced themselves and asked about the work being done at 37 Back Street. He immediately admitted doing the work and said he had just been hired by Welsh Realty within the last month (June 2015) or so to do general maintenance and repairs on their properties. Lopez said that he lives in Vermont. Mr. Lopez stated that he was not certified as an RRP Renovator,

but had just looked into it online after hearing the complaints by Ms. Acosta. When asked by Inspector Magoon about where his employers were, Mr. Lopez then called the Welshes on his cell phone and asked them to meet him and the inspectors at the Back Street property. He informed the inspectors that the property owners should be there within an hour or so. Mr. Robert Welsh (“Bob”), is a Principal Member and Property Manager of Welsh Realty dba Beebe Valley Family Ltd. His son, Robert (Rob”) Welsh does the hands on work of leasing and maintaining and hiring others to help maintain the rental properties.

On July 17, 2015, about an hour or so after Mr. Lopez called him, Bob Welsh arrived at the 37 Back Street property. The inspectors introduced themselves and Inspector Magoon showed her EPA credentials to Bob Welsh. She asked for permission to conduct inspections- one for the EPA’s Lead Disclosure Rule and the other for the EPA’s Renovation, Repair and Painting (“RRP”) Rule. He granted permission for both of the inspections. His son, Robert “Rob” Welsh arrived approximately 15 minutes later. Again, the inspectors introduced themselves to Rob Welsh and Inspector Magoon showed him her credentials. Inspector Magoon asked both Bob and Rob Welsh for their permission to conduct the lead inspection regarding the 1018 Disclosure and TSCA 402 RRP Rules. Both of them granted permission for the inspection to continue. Inspector Magoon asked Rob Welsh to sign the EPA’s Notices of Inspection forms and the CBI form. Inspector Magoon also asked Rob Welsh for permission to access the 37 Back Street property for a RRP worksite inspection of ongoing work being done on the exterior of that property (subject of the complaint).

Inspector Magoon explained what the inspections (1018 and RRP) would entail and proceeded to conduct them. The EPA inspector completed and obtained Rob Welsh’s signatures on EPA’s (TSCA) *Notice of Inspection* forms: one of each form for the Disclosure and RRP inspections and the TSCA *Inspection Confidentiality Notice* (CBI) form ([Attachments 1, 2 and 3](#)). Rob Welsh did not make a claim of confidentiality. He allowed Inspector Magoon full access to the worksite. Inspector Magoon took photographs during the RRP worksite inspection. The photos are logged into the accompanying “Photo Log,” which was prepared by Inspector Magoon ([Attachment 4](#)).

V. Business Operations

The Welsh’s company, Welsh Realty, operates as a company that owns, leases and maintains approximately 40 target housing properties having a total of ~60 target housing units in Vermont and ~50 target housing units in NH, which are owned under various different business entities. Bob Welsh started acquiring properties many years ago (~1970s) and Rob Welsh started working at the family operated Welsh Realty within the last few years after graduating from college. A list of properties was collected after the inspection when Rob Welsh sent them in an email to Inspector Magoon.

Beebe Valley Family Ltd. Partnership is one of the five entities under the Welshes control (see Table #1 below) and it is the owner of 18 target housing properties in NH, one of which is 37 Back Street, in Campton (subject of the complaint). Welsh Realty dba Beebe Valley Family Ltd.

Partnership is a domestic limited liability corporation registered in the State of New Hampshire. The house at 37 Back Street in Campton, NH is in a remote, historic neighborhood and one of many residential houses in the same neighborhood that Beebe Valley Family Ltd. Partnership owns and Rob Welsh manages. The property is located in an environmental justice (“EJ”) area. Historically, 37 Back Street and the other houses in this neighborhood were built in the 1920s and 1930s to house workers at a factory located not far from their houses. The factory no longer is in business. Supposedly, wooden spindles were made there for the textile industrial factories throughout New England.

Bob and Rob Welsh have been operating without any understanding of the EPA’s Disclosure Rule or the RRP Rule. Neither gave any of their tenants lead Disclosure Forms (DFs), unless the tenants were receiving Section 8 assistance from HUD. Rob Welsh stated that Welsh Realty and the different entities that own the properties does not usually enter into written leases with its tenants- or very few of them. He did not provide EPA with any leases or DFs until after the EPA inspection. There is at least one known elevated blood lead levels (“EBLL”) among children living in the properties at this time. According to Knatalie Vetter of NH DHHS, an abatement order was issued to Beebe Valley Family Ltd. Partnership for the childhood lead poisoning case involving a child residing in the 37 Back Street, Campton, NH property.

Inspector Magoon explained the requirements for compliance with the Disclosure and RRP Rules to the both of the Welshes. She gave Rob Welsh information on how to get his business RRP firm certification. Rob Welsh was asked to send EPA several documents, including a list of current residents (rent roll with move-in dates for each unit) in all of their target housing properties and also any documentation regarding compliance with the RRP rule, including but not limited to, proof of RRP training that he or members of Welsh Realty staff and/or subcontractors may receive in the near future. Later, Rob Welsh sent a copy of the tenant list to Inspector Magoon (Attachment 5).

Rob Welsh explained that Welsh Realty, under the names of different entities, owns the properties and he manages them. He performs minor maintenance and cleaning. He usually works on them when they are vacant. He hired several subcontractors, including Horace “Hod” Pike, who is certified as an RRP Renovator, and hired an employee, Johnny Lopez, who is not RRP certified, to perform other repairs and maintenance during turn-overs at his target housing properties. He does not keep records of their work and does not have a written contract with his subcontractors or employee.

VI. Record Review

Inspector Magoon received a detailed list of all leases involving any of the ~106 target housing units owned by various entities and managed by Welsh Realty. Inspector Magoon reviewed a list of current residents and requested information about 14 lease transactions (see the Table 1 below).

Table 1: Summary of Target Housing Properties Managed by Welsh Realty and Owned by Various, Related Entities

Property Owner	Description of Properties	Number of Target Housing Units	Managed and Maintained by Welsh Realty	Date of Construction
1. Beebe Valley Family Ltd. Partnership	<u>18 Target Housing Properties:</u> <u>19, 23, 24, 27, 30, 33, 37, 38, 41, 43, 45 Back Street, Campton, NH</u> (11 single family homes with 3 bedrooms); <u>16, 18, 20, 22 Tie Street, Campton, NH</u> (4 single family homes with 1 bedroom or more); <u>280 Main Street, Littleton, NH</u> (3 units - 1 bedroom or more); <u>13 Locust Street, Woodsville, NH</u> : 5 units of 1 bedroom or more in multi-family home; <u>68 Main Street</u> : 7 units - 1 bedroom or more in multi-family home and duplex.	<u>Total: 28 target housing units</u>	Welsh Realty	<u>11 Back Street properties, Campton, NH:</u> 1930 <u>4 Tie Street properties, Campton, NH:</u> 1930 <u>280 Main Street, Littleton, NH:</u> 1842 <u>13 Locust Street, Woodsville, NH:</u> 1900 <u>68 Main Street:</u> 1900
2. Rob's (son) Haverhill Property	<u>6 Target Housing Properties:</u> <u>2191 Dartmouth College Hwy., North Haverhill, NH</u> (9 units - 1 bedroom or more in multi- family home, including one unit occupied by owner); <u>10 Railroad Street, Woodsville, NH:</u> (4 units - 1 bedroom or more in multi-family home); <u>7 Pine Street, Woodsville, NH:</u> (6 units - 1 bedroom or more in multi-	<u>Total: 30 target housing units</u>	Welsh Realty	<u>2191 Dartmouth College Hwy., North Haverhill, NH:</u> 1880 <u>10 Railroad Street, Woodsville, NH:</u> 1900 <u>7 Pine Street, Woodsville, NH:</u> 1870 <u>35 King Street, Woodsville, NH:</u> 1896 <u>22 Beech Street,</u>

	family home); <u>35 King Street, Woodsville, NH</u> : 2 units - 1 bedroom or more in multi-family home); <u>22 Beech Street, Woodsville, NH</u> (5 units - 1 bedroom or more in single family home); <u>22 Maple Street, Woodsville, NH</u> : 4 units - 1 bedroom in multi-family home.			<u>Woodsville, NH</u> 1896 <u>22 Maple Street, Woodsville, NH</u> 1880
3. Bob's (father) Rentals LLC	<u>6 Target Housing Properties:</u> <u>168 North Pleasant Street, Bradford, VT</u> : 3 units - 1 bedroom or more in multi-family home; <u>297 North Pleasant Street, Bradford, VT</u> : 3 units - 2 bedrooms or more; <u>290 Main Street, Littleton, NH</u> : 2 units - 2 bedrooms or more in multi-family home; <u>12 Highland Street, Woodsville, NH</u> : 4 units - 1 bedroom or more in multi-family home <u>9 Romance Lane, Newbery, VT</u> : single family home; <u>55 Union Street, Littleton, NH</u> : single family home.	<u>Total: 14 target housing units</u>	Welsh Realty	<u>168 North Pleasant Street, Bradford, VT</u> : Late 1880s <u>297 North Pleasant Street, Bradford, VT</u> : Late 1880s <u>290 Main Street, Littleton, NH</u> : 1850 <u>12 Highland Street, Woodsville, NH</u> : 1900 <u>9 Romance Lane, Newbery, VT</u> : 1900 <u>557 Union Street, Littleton, NH</u> : Late 1800s/early 1900s
4. Robert F. Welsh Trust Income Acct	<u>5 Target Housing Properties:</u> <u>9 Norwich Ave., Wilder, VT</u> : 9 units -1 bedroom in multi-family home; <u>83 Main Street, Wells River, VT</u> : 5 units - 1 bedroom or	<u>Total: 23 target housing units.</u>	Welsh Realty	<u>9 Norwich Ave., Wilder, VT</u> : 1900, rehab 1980 due to fire <u>83 Main Street, Wells River, VT</u> : 1920

	more in multi-family home; <u>70 Main Street, Wells River, VT</u> : 4 units - 1 bedroom or more in multi-family home; <u>10 Oak Hill, Woodsville, NH</u> : 3 units - 1 bedroom or more in multi-family home; <u>4155 Route 5, West Burke, VT</u> : 2 units - 1 bedroom or more in multi-family home.			<u>70 Main Street, Wells River, VT</u> : 1900 <u>10 Oak Hill, Woodsville, NH</u> : 1900 <u>4155 Route 5, West Burke, VT</u> : 1830 and new addition 1980
5. Jettison LLC	<u>5 Target Housing Properties</u> : <u>29 Railroad Street, Wells River, VT</u> : 7 units - 1 bedroom or more in multi-family home; <u>Burt's Way and Mayberry Lane, Lincoln, NH</u> : 4 trailers with - 1 bedroom or more in each.	<u>Total: 11 target housing units</u>	Welsh Realty	<u>29 Railroad Street, Wells River, VT</u> : 1900 <u>Burt's Way and Mayberry Lane, Lincoln, NH</u> : Trailers built between 1960s and 1980s
<u>Total:</u> 5 property owner entities	<u>Total:</u> 40 Target Housing Properties	<u>Total:</u> 106 Target Housing units		

Table 2: Summary of Table: Selected Leases for 1018 Lead Disclosure Rule Compliance Review (includes move-in dates):

1.	33 Back St., Campton, NH (tenant move-in date: 8/14)
2.	37 Back St., Campton, NH (tenant move-in date: before 7/13, but subject of complaint)
3.	18 Tie St., Campton, NH (tenant move-in date: 6/15)
4.	13 Locust St., Woodsville, NH (tenant move-in date: 4/15)
5.	68 Main Street, Wells River, VT (tenant move-in date: 04/14)
6.	2191 Dartmouth College Highway, North Haverhill, tenant move-in date: 6/14)
7.	10 Railroad St., Woodsville, NH (tenant move-in date: 12/13)
8.	7 Pine St., Woodsville, NH (tenant move-in date: 1/15)
9.	22 Maple St., Woodsville, NH (tenant move-in date: 2/15)
10.	297 N. Pleasant St., Bradford, VT (tenant move-in date: 12/14)
11.	55 Union St., Littleton, NH (tenant move-in date: 10/14)
12.	9 Norwich Ave., Wilder, VT (tenant move-in date: 4/15)
13.	70 Main St., Wells River, VT (tenant move-in date: 1/15)
14.	29 Railroad St., Wells River, VT (tenant move-in date: 11/13)

Table 3: Summary of Information regarding Selected Leases Transactions and Lead Disclosures

#	Address	Kids Y/N	Move-In Date	Date DF Signed	Notes
1	33 Back St., Campton, NH	2+ children: elementary school age 7-13 yrs. old	8/2014	No DF	DF: No DF was provided at time of lease; DF signed after EPA inspection.
2	37 Back St., Campton, NH	4 children: one under 6 yrs. old, others between 7 and 18 yrs.	Before 7/2013, but subject of complaint	Late DF signed after EPA inspection: 07/29/14	DF: No DF was provided at time of lease; DF signed after EPA inspection
3	18 Tie St., Campton, NH	One child: elementary age	6/2015	No DF	
4	13 Locust St., Woodsville, NH	unknown	4/2015	No DF	
5	68 Main Street, Wells River, VT	3 children: ranges from infant (under 6 yrs. old) to elementary school (7- 18 yrs. old)	04/2014	No DF	

#	Address	Kids Y/N	Move-In Date	Date DF Signed	Notes
6	2191 Dartmouth College Highway, North Haverhill, NH	One child: infant under 6 yrs. old	6/2014	No DF	
7	10 Railroad St., Woodsville, NH	2 children: infant and 4 yrs. old	12/2013	No DF	
8	7 Pine St., Woodsville, NH	One child: infant under 6 yrs. old	1/2015	No DF	
9	22 Maple St., Woodsville, NH	None	2/2015	No DF	
10	297 N. Pleasant St., Bradford, VT	unknown	12/2014	No DF	
11	557 Union St., Littleton, NH	unknown	10/2014	No DF	
12	9 Norwich Ave., Wilder, VT	unknown	4/2015	No DF	
13	70 Main St., Wells River, VT	none	1/2015	No DF	
14	29 Railroad St., Wells River, VT	Yes, several children: 6 yr. old and others: 13 – 18 yrs. old	11/2013	No DF	

RRP Records Summary:

Inspector Magoon requested that Rob Welsh send her copies of additional documents during the inspection and some records were sent to Inspector Magoon after the inspection by him. The records provided were copies of Individual Renovator RRP training certificates and a written summary of work recently done that may involve exceedances of the RRP thresholds (greater than 6 sq. ft. interior/20 sq. ft. exterior painted surface disturbances). A written description of all work conducted in target housing managed by Welsh Realty was drafted by Rob Welsh and sent to Inspector Magoon on November 3, 2015 ([Attachment 6](#) and [see Table 4](#) below for a summary of RRP work). Rob Welsh told Inspector Magoon in an email that he had not given RRP pamphlets or collected tenant acknowledgments for their receipt of any “Renovate Right” pamphlets prior to the EPA inspection. Although requested, Inspector Magoon has not received any proof of cleaning verification after any of the RRP work that by Welsh Realty has completed to date. Inspector Magoon completed a form during the inspection regarding the RRP Rule, “EPA Region 1 RRP Inspection Checklist- Target Housing” ([Attachment 7](#)). It contains answers to EPA questions that Inspector Magoon asked Rob Welsh about the RRP work being done at the rental property located at 37 Back Street, Campton, NH.

Table 4: Summary of RRP Work Conducted on Welsh Realty Properties, excerpts from List of Work provided to EPA by Rob Welsh:

Property Address	Description of Work/Date of Work (*if date not specified, it occurred sometime between 7/13 and 9/15 according to Rob Welsh)	Subject to RRP? / Notes
19 Back. St., Campton, NH	Complete renovation: New kitchen, bathroom, flooring, painting. Vacant. Current project	Yes. Especially, new kitchen, bathroom and painting
27 Back St., Campton, NH	Complete Renovation: New kitchen 8/14	Yes
37 Back St., Campton, NH	Stabilized plaster in bedroom by covering with sheetrock. Attempted to reside/repaint the building	Yes
43 Back St., Campton, NH	New base cabinets on one wall in kitchen	Unknown. No information on whether the RRP threshold for interior painted surface disturbance (greater than 6 sq. ft. of painted surface) was exceeded or not
45 Back St., Campton, NH	Stabilized interior peeling paint before current tenant 7/15	Yes
22 Tie St., Campton, NH	Complete renovation; renovate and build new kitchen, fix bathroom, painting, poly-urethane floors. Completed by 6/14	Yes. Yes. Especially, new kitchen, bathroom and painting
280 Main St., Littleton, NH	1st floor 3 bedroom- Complete renovation: new kitchen, new bathroom, flooring, polyurethane, and painting	Yes
13 Locust St., Woodsville,	1st floor 2 bedroom- Renovate new kitchen,	Yes

NH	hardwood flooring, polyurethane. Completed by 1/15	
68 Main St., Wells River, VT	2nd floor 2 bedroom- Peeling bathroom ceiling paint stabilized. EMP inspections	Unknown. No information on whether the RRP threshold for interior painted surface disturbance (greater than 6 sq. ft. of painted surface) was exceeded or not
68 Main St., Wells River, VT	Complete Renovation: includes work on Basement 1 bedroom; removed paneling, new sheet rocked walls, new kitchen, new dropped ceiling, new bathroom, new flooring. Completed 9/15.	Yes
2191 Dartmouth College Highway, North Haverhill, NH	1st floor 2 bedroom- Replaced electrical outlets with child tamper proof outlets. Complete renovation of new kitchen. Stabilized paint as well. Done prior 06/14.	Yes. Especially, new kitchen portion
10 Railroad St., Woodsville, NH	Complete renovation: including: 1st floor 3 bedroom; new flooring, new kitchen, new bathroom, polyurethane/stained floors, installed hardwood floors, repainted. Removed old flooring	Yes. Especially, new kitchen and new bathroom portions
10 Railroad St., Woodsville, NH	Under complete renovation: 3rd floor 1 bedroom. Vacant. Has been vacated 2+ years	Yes
22 Maple St., Woodsville, NH	1st floor 1 bedroom- stabilized mildew/peeling paint bathroom. 09/13. New kitchen floor and tenant installed hardwood floor in bedroom. Stabilized paint 3 season porch	Yes. Especially painting in bathroom and porch portions
290 Main St., Littleton, NH	Complete renovation: 2nd floor 3 bedroom:	Yes.

	included new drywall covering living room ceiling and bedroom wall; New bathroom; New kitchen; New flooring; and Polyurethane floors. Completed by 02/15. Renovation done when Vacant	Especially new bathroom and new kitchen portions
70 Main St., Wells River, VT	Complete renovation: 1st floor 2 bedroom: included: New kitchen, new flooring, new bathroom, polyurethane floors, repainted. Completed by 06/14. EMP inspections	Yes. Especially, new kitchen, bathroom and painting
29 Railroad St., Wells River, VT	1st floor 1 bedroom- EMP/RRP work on inside porch- 08/15. Stabilized bathroom ceiling - 02/14	Yes
280 Main St., Littleton, NH	Complete renovation: 1st floor 3 bedroom.	Yes
280 Main St., Littleton, NH	Complete renovation: new kitchen, new bathroom, flooring, polyurethane, painting	Yes. Especially, new kitchen, bathroom and painting

VII. Closing Conference

At the time of the inspection, no leases were collected and both of the Welshes admitted that there were no DFs given to the tenants at move-in or after Welsh Realty purchased the properties. DFs were signed by tenants after the EPA inspection and then submitted with the leases. There was no documentation of RRP compliance. Mr. Welsh and one of his subcontractors, Mr. Horace “Hod” Pike, are RRP certified as a renovator at the time of the inspection, but neither Welsh Realty nor Mr. Pike were RRP firm-certified at the time of the inspection. One of the employees of the Welshes, Johnny Lopez, who was doing RRP work at 37 Back Street, Campton, NH property, was not certified as an RRP renovator. There was no documentation provided to Inspector Magoon showing that Mr. Lopez, as a “non-certified worker” was properly informed on how to perform the work according to lead safe work practices, required under the RRP Rule.

Inspector Magoon filled out the “*Notification of Potential Violation(s) of the Disclosure Rule*” and noted that Lead Paint Disclosures were not provided and gave the completed form to Rob Welsh. She requested that tenants’ leases and DFs be sent to her. She also filled out the “*Notification of Potential Violation(s) of the Federal Renovation, Repair, and Painting Rule*” form, and Inspector Magoon gave this completed form to Mr. Welsh.

Inspector Magoon then explained the next steps in EPA’s enforcement process. Copies of the

Notice of Inspection, TSCA Inspection Confidentiality, and Receipt for Documents forms were sent to Rob Welsh for his records and copies of EPA's two notifications, one for "*Notification of Potential Violation(s) of the Disclosure Rule*" and a second one, "*Notification of Potential Violation(s) of Federal Renovation, Repair, and Painting Rules*" were provided to Mr. Welsh at the end of the inspection. The EPA inspector thanked Rob Welsh for his courtesy and cooperation during the inspection.

Inspector Magoon and Charles Brousseau, a representative of the Town of Campton, NH Health Dept. left the premises of 37 Back Street for a break. Inspector Magoon returned to 37 Back Street and observed the a new barrier fence was put up, as well as red plastic tape with the word "Danger" on it and several new "Lead Warning" signs had been posted around the worksite at 37 Back Street property. Inspector Magoon took additional pictures of these new modifications to the worksite. She also spoke with Jennifer Acosta, mother of the lead poisoned child, who lives at the 37 Back Street property. Jennifer Acosta agreed to make a sworn Statement and also wrote a statement releasing the medical information about her children and gave the handwritten statements to Inspector Magoon, who signed the statements as a witness (Attachment 8). Inspector Magoon left the worksite at 5:30 pm.

VII. Compliance Assistance Activities Provided By EPA

Inspector Magoon gave both Welshes a copy of EPA's Lead Paint Rules Compliance Assistance packet. Inspector Magoon explained the Disclosure and RRP Rules in detail and gave Rob Welsh information on how to become certified as a firm.

VIII. Post-Inspection Follow-up Activities

Inspector Magoon has spoken with Rob Welsh on the telephone several times and exchanged many emails since the inspection. Mr. Welsh has informed Inspector Magoon that his employee Mr. Lopez may be taking the RRP renovator training course, and that his company along with his contractor, Hod Pike, will be applying for RRP firm certification. Inspector Magoon requested that he send her copies of any new RRP Renovator and/or RRP firm certificates and newly signed disclosure forms when he receives them or completes them. Mr. Welsh has sent many of these requested items to Inspector Magoon since the inspection. Mr. Welsh mailed a copy of his recently issued RRP Renovator certificate, issued by Calypso Continuing Education of Randolph, VT, dated 7/23/15, Certificate #: R-I-18718-15-00359 (Attachment 9). He also sent copies of one of his subcontractors' (Hod Pike) RRP renovator certificates and his own NH-issued Lead Abatement Contractor license (license # DC-000377, expires 8/08/18). He told Inspector Magoon that he will be applying for the RRP Firm certification and will provide Inspector Magoon a copy of the certificate when he receives it. A copy of the RRP Firm Certificate has not been received by Inspector Magoon to date, although Rob Welsh claims that he has received it.

After the inspection, Mr. Welsh provided lists of tenants and the move-in dates. He enters into very few if any written leases, and informed Inspector Magoon that his rent roll records serve as

proof of move-in dates and length of tenancies for his tenants. Inspector Magoon suggested that Mr. Welsh collect signed lead disclosure forms regardless of the fact that the tenants have already moved in. She described this action as a show of “good faith” that the company was getting into compliance. She also suggested that they collect signed acknowledgments for ongoing renovations, including the work at 37 Back Street. According to Mr. Welsh, he has accomplished both of these actions and has collected recently signed DFs from all of his tenants upon the suggestion of Inspector Magoon during the inspection. As requested, Mr. Welsh also provided Inspector Magoon with a description of all work, including RRP covered work, which has been completed in any of the Welsh Realty managed properties within the last two years (Attachment 6).

List of Attachments

1. Copy of signed TSCA *Notice of Inspection* form (1018);
2. Copy of signed TSCA *Notice of Inspection* form (RRP – TSCA 402(c));
3. Copy of signed TSCA *Inspection Confidentiality Notice* (“CBI”) form;
4. Copies of Photographs taken by Inspector Magoon and accompanying Photo Log;
5. List of all current tenants provided after the inspection to Inspector Magoon;
6. List of Interior Work done on Welsh Realty properties, provided in an email from Rob Welsh to Inspector Magoon, dated November 3, 2015;
7. Copy of *EPA Region 1 RRP Inspection Checklist- Target Housing* checklist form completed by Inspector Magoon during the RRP inspection on July 17, 2015;
8. Copies of 2 Statements by Jennifer Acosta, dated July 17, 2015; and
9. Copies of Rob Welsh’s and Hod Pike’s RRP Individual Renovator Certificates; and copy of Rob Welsh’s NH Lead Abatement Contractor license; various dates.